

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Israel A. Schwartz, Esq.
O'HANLON SCHWARTZ, P.C.
511 Market Street
Camden, NJ 08102
Telephone: (267) 546-9066
– and –
Moshie Solomon, Esq.
LAW OFFICES OF MOSHIE SOLOMON, P.C.
Two University Plaza, Suite 100
Hackensack, New Jersey 07601
Telephone: (201) 705-1470

In Re:
MARIAH D. HERNANDEZ,
Debtor.

Case No.: 24-14880
Chapter: 13
Judge: ABA

**LANDLORD'S REPLY TO CHAPTER 13 DEBTOR'S OPPOSITION
TO CREDITOR'S CERTIFICATION OF DEFAULT**

David Klein certifies as follows:

1. I am a Regional Manager for Goldcrest Properties a/k/a East Park Apartments, landlord and creditor of the debtor.
2. On December 4, 2024, an Order was entered, a copy of which is attached as an exhibit, providing for the cure of post petition arrearages, and in default of such monthly payments for a 10 day period, allowing the landlord ex parte relief to vacate the stay, with notice to the trustee, debtor and her attorney, if any. On December 13, 2024, Landlord filed a Creditor's Certification of Default. On December 30, 2024, the Debtor filed opposition to the Certification.
3. Debtor has failed to comply with the order:
 - By missing payments and/or by failing to make the correct payments as summarized on the attached Supplemental Certification of Landlord Regarding Payment History and accompanying ledger.
 - Other _____.

4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay.
5. I certify under penalty of perjury that the above is true.

Date: January 15, 2025

Karil Klein
Signature